Filed: 8/12/2020 9:02 AM
Lynne Finley
District Clerk
Collin County, Texas
By Tatiana Ortega Deputy
Envelope ID: 45303625

NO. 417-53803-2020

IN THE INTEREST OF	**§**	**IN THE DISTRICT COURT**
	§	
S., J. AND J.	**§**	**417TH JUDICIAL DISTRICT**
	§	
CHILDREN	**§**	**COLLIN COUNTY, TEXAS**

MOTION FOR WITHDRAWAL OF COUNSEL

This Motion for Withdrawal of Counsel is brought by Elizabeth Nielsen, who is attorney of record for Michael Long. Elizabeth Nielsen requests the Court to grant her permission to withdraw as attorney for Michael Long in this case. In support, Elizabeth Nielsen shows:

Good cause exists for withdrawal of Elizabeth Nielsen as counsel, in that she is unable to effectively communicate with Michael Long in a manner consistent with good attorney-client relations.

A copy of this motion has been delivered to Michael Long, who is hereby notified in writing of his right to object to this motion. Michael Long has consented to the motion, via telephone conference on August 12, 2020. The last known address of Michael Long is 181 High Point Ridge, Seguin, Texas, 78155.

The settings and deadlines, including discovery deadlines, in this case are as follows:

Temporary Restraining Order Hearing 8/12/2020

There have not been any hearings in this case.

The discovery period in this suit will continue until ordered by the court.

Respondent has served Petitioner with the following discovery requests and Petitioner has served Respondent with the following responses:

Type of Discovery Request	Served by Respondent?		Response Served by Petitioner?	
	Yes	No	Yes	No
Interrogatories	X			X

Request for Production	X			X
Request for Disclosure	X			X
Request for Admissions	X			X

There have not been any oral depositions in this case.

On entry of an order granting this motion and discharging Movant as attorney of record for Michael Long, Movant will provide Michael Long with the originals of all of Michael Long's discovery responses and documents Michael Long has produced in response to discovery requests.

Notice to Client

You are hereby notified that this Motion for Withdrawal of Counsel is set for hearing at the time and place stated below. You do not have to agree to this motion. If you wish to contest the withdrawal of Elizabeth Nielsen as your attorney, you should appear at the hearing. If you do not oppose Elizabeth Nielsen's withdrawal as your attorney, you may notify Elizabeth Nielsen in writing of your consent to this motion.

Elizabeth Nielsen prays that the Court enter an order discharging her as attorney of record for Michael Long.

Respectfully submitted,

Bailey & Galyen
2216 S. Cooper St.
Arlington, Texas 76013
Tel: (817) 635-7013
Fax: (817) 276-6013

By:_____
Elizabeth Nielsen
State Bar No. 24034601
enielsen@galyen.com
Attorney for Michael Long

Certificate of Service

I certify that a true copy of this Motion for Withdrawal of Counsel was served in accordance with rule 21a of the Texas Rules of Civil Procedure on the following on August 12, 2020:

Amber Shemesh by electronic filing manager.

Elizabeth Nielsen
Attorney for Michael Long

Automated Certificate of eService

This automated certificate of service was created by the efiling system. The filer served this document via email generated by the efiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Celia Morgan on behalf of Elizabeth Nielsen
Bar No. 24034601
cmorgan@galyen.com
Envelope ID: 45303625
Status as of 08/12/2020 11:50:15 AM -05:00

Associated Case Party: Kelly Long

Name	BarNumber	Email	TimestampSubmitted	Status
Amber Shemesh		amber@shemeshfamilylaw.com	8/12/2020 9:02:10 AM	SENT
Adriana Cancino		acancino@shemeshfamilylaw.com	8/12/2020 9:02:10 AM	SENT
Alexandra Willen		awillen@shemeshfamilylaw.com	8/12/2020 9:02:10 AM	SENT

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Elizabeth A.Nielsen		enielsen@galyen.com	8/12/2020 9:02:10 AM	SENT
Celia Morgan		cmorgan@galyen.com	8/12/2020 9:02:10 AM	SENT